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Attorneys for Defendants
UBER TECHNOLOGIES, INC.;
RASIER, LLC; and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF CHRISTOPHER V.
COTTON IN SUPPORT OF UBER'S
ADMINISTRATIVE MOTION TO SEAL
PERSONAL IDENTIFYING INFORMATION
CONTAINED IN DEFENDANTS' REPLY IN
SUPPORT OF MOTION FOR ENTRY OF
SECOND RECEIPTS ORDER AND
ACCOMPANYING DOCUMENTS**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Christopher V. Cotton, declare as follows:

2 1. I am an attorney at Shook, Hardy & Bacon L.L.P., counsel of record for Defendants Uber
3 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber” or “Defendants”). I offer this
4 Declaration in the above-captioned matter in support of Uber’s Administrative Motion to Seal Personal
5 Identifying Information Contained in Defendants’ Reply in Support of Motion for Entry of Receipts Order
6 and Accompanying Documents (the “Sealing Motion”).


7 2. Counsel for Uber previously met and conferred with the Nachawati and Chaffin Luhana
8 firms concerning the sealing of personally identifying information (“PII”) in connection with Uber’s
9 Motion for Entry of (1) an Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
10 Receipts Should Not Be Dismissed with Prejudice and (2) a Case Management Order Addressing Certain
11 Plaintiffs Who Have Not Submitted Receipts. ECF 3602-1. Counsel indicated that they did not oppose
12 sealing PII, including counsel from Chaffin Luhana who serves as part of Plaintiffs’ Leadership in this
13 matter. The Court granted Uber’s motion to seal. ECF 3616. The sealed information contained in the
14 instant Sealing Motion is the same sort of PII that has already been filed under seal, unopposed by the
15 Nachawati and Chaffin Luhana firms.

16 3. Counsel for Uber also previously made diligent efforts to meet and confer with Plaintiffs’
17 counsel concerning the sealing of PII in connection with Uber’s Motion for Entry of an Order to Show
18 Cause Why 6 Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed with
19 Prejudice. Those efforts are detailed in my declaration in support of Uber’s motion to seal the PII in that
20 motion. ECF 3783-1. Counsel for Uber have not received any communications from any Plaintiff’s
21 counsel regarding opposition to the sealing of the material detailed in ECF 3783. Part of the sealed
22 information contained in the instant Sealing Motion is a subset of the PII that was included in Uber’s prior
23 motion to seal, and other sealed information is the same sort of PII.

24 I declare under penalty of perjury under the laws of the State of California and the laws of the
25 United States of America that the foregoing is true and correct.

1
2 Dated: September 18, 2025

Respectfully submitted,

3 By: 

4 Christopher V. Cotton (admitted *Pro Hac*
5 *Vice*)

6 **SHOOK, HARDY & BACON L.L.P.**

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10 LLC; and RASIER-CA, LLC